

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

TRIANGLE EXPERIENCE GROUP, INC.)	
)	
Plaintiff,)	Case No. 1:23-cv-01797-MSN-LRV
)	
v.)	Honorable Judge Michael S. Nachmanoff
)	
MAX MINDS, LLC,)	JURY TRIAL DEMANDED
)	
Defendant.)	
)	

**DEFENDANT MAX MINDS, LLC’S MOTION TO DISMISS, OR ALTERNATIVELY,
TO TRANSFER VENUE**

Defendant Max Minds, LLC (“MAX”), by counsel, moves this Court to dismiss Plaintiff Triangle Experience Group, Inc.’s (“TEG”) Complaint (Dkt. 1) pursuant to Federal Rule of Civil Procedure 12(b)(2) or Rule 12(b)(3), or in the alternative, to transfer the above-captioned action to the United States District Court for the Southern District of Indiana, Indianapolis Division, pursuant to either 28 U.S.C. § 1406(a) or 28 U.S.C. § 1404(a). As explained more fully in MAX’s Brief in Support filed contemporaneously herewith, this Court lacks personal jurisdiction over MAX and this Court is not a proper venue for this action. Accordingly, the Complaint should be dismissed. Alternatively, MAX moves this Court to transfer this action to the United States District

Court for the Southern District of Indiana, Indianapolis Division, pursuant to either 28 U.S.C. § 1406(a) on grounds of improper venue or 28 U.S.C. § 1404(a) on grounds of inconvenient forum.

Date: March 4, 2024

Respectfully submitted,

/s/ Timothy D. Belevetz

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Counsel for Defendant Max Minds, LLC

CERTIFICATE OF SERVICE

I certify that on this 4th day of March, 2024, I caused the foregoing to be filed electronically using the Court's CM/ECF system, which sends a notification of such filing to all counsel of record.

/s/ Timothy D. Belevetz

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